

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re AGRIA CORPORATION SECURITIES	: Civil Action No. 1:08-cv-03536-WHP
LITIGATION	: : <u>CLASS ACTION</u>
_____	: : REPLY MEMORANDUM IN SUPPORT OF
This Document Relates To:	: LEAD PLAINTIFF'S MOTION FOR (1)
ALL ACTIONS.	: FINAL APPROVAL OF SETTLEMENT AND
_____	x PLAN OF DISTRIBUTION OF
	SETTLEMENT PROCEEDS; AND (2) AN
	AWARD OF ATTORNEYS' FEES AND
	EXPENSES

Pursuant to the Court's September 20, 2010 Order preliminarily approving the settlement of the above-captioned litigation, and as a supplement to the initial filing made by Lead Plaintiff and Lead Counsel on December 30, 2010, Lead Plaintiff respectfully submits to the Court the following information regarding the status of any objections received.

As set forth in the Declaration of Carole K. Sylvester Re A) Mailing of the Notice of Pendency and Proposed Settlement of Class Action and the Proof of Claim and Release Form, B) Publication of the Summary Notice, and C) Internet Posting, filed with the Court on December 30, 2010, a total of 19,344 notice packages were sent to potential Class Members. The deadline for filing objections to the Settlement, Plan of Distribution of settlement proceeds, and attorneys' fee and expense request by Lead Plaintiff's counsel expired on January 7, 2011, and no such objections were filed by Class Members.

For the reasons set forth in his previously submitted memoranda, and following an extensive notice program in response to which no objections were filed, Lead Plaintiff respectfully submits that the Settlement is a very good result for the Class and the proposed Plan of Distribution of settlement proceeds is a fair and equitable method for distributing the Net Settlement Fund. Therefore, both should be approved as fair, reasonable, and adequate. Finally, the fee and expense

request by Lead Counsel is reasonable under the circumstances and should be awarded in the amounts sought.

DATED: January 14, 2011

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2011, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 14, 2011.

s/ Ellen Gusikoff Stewart

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## Mailing Information for a Case 1:08-cv-03536-WHP

### Electronic Mail Notice List

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## Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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